

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NICHOLE BEINER, : 24 Civ. 8600 (FB) (JAM)
Plaintiff, :
: .
- against - :
: .
ANGELIQUÉ M. MORENO, Chair of the State of : **NOTICE OF MOTION**
New York Grievance Committee for the Second, :
Eleventh, and Thirteenth Judicial Districts, in her :
official capacity, et al., :
: .
Defendants. ----- X

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Yuval Rubinstein, dated May 19, 2025 and supporting exhibits attached thereto, the Memorandum of Law in Support of Defendants' Motion to Stay Proceedings or, in the Alternative, Dismiss the Complaint, dated May 19, 2025, and all other prior pleadings and proceedings herein, defendants (collectively "Defendants"), by their attorney, Letitia James, New York State Attorney General, hereby move this Court before the Honorable Frederic Block, United States District Judge, for an Order staying proceedings pending the Second Circuit's decision in *Civil Rights Corps. et al. v. LaSalle, et al.*, No. 21 Civ. 9128 (S.D.N.Y.), No. 24-2251 (2d Cir.) or, in the alternative, dismissing with prejudice the Complaint (ECF No. 1) pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's April 22, 2025 Scheduling Order, Plaintiff's opposition papers must be served no later than June 18, 2025.

Dated: May 19, 2025
New York, New York

LETITIA JAMES
Attorney General
State of New York
Attorney for Defendants
By:

/s/
Yuval Rubinstein
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